REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 30-50 are pending. Claims 30 and 45 have been amended. No claims have been cancelled or added.

Claims 30-50 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,326,965 to Castelli et al. ("Castelli"). Castelli is directed to a method of representing and retrieving multi-dimensional data and images. The method of Castelli is performed by decomposing the data into view elements; selecting, compressing, and storing a set of the view elements; and then retrieving, decompressing, and processing the stored set to create the data. The decomposition of the data is into a fraction of the entire image using spatial segmentation and frequency decomposition.

Amended Claim 30 distinguishes over Castelli. Claim 30 has been amended to more clearly recite that only those subpictures that are needed are created. In amended claim 30, after receipt of an element of a picture for storing and identification of a subpicture in which the received element may be placed, a determination is made as to whether the identified subpicture has previously been loaded. If the identified subpicture is determined to not have been loaded, then loading of the identified subpicture occurs. Support for this amendment is found on at least page 8, lines 4-6 of the specification.

Claim 45 also distinguishes over Castelli. Claim 45 has been amended to recite that the processor and memory of the graphics system are capable of determining whether the identified subpicture has previously been loaded and loading the identified subpicture if it is determined that the identified subpicture has not been loaded. Support for this amendment may be found on at least page 8, lines 4-6 of the specification.

As such, Applicants respectfully submit that amended Claims 30 and 45, and those claims dependent therefrom, distinguish over Castelli. Withdrawal of the rejection of Claims 30 and 45 and those claims dependent therefrom is respectfully requested.

Claim 38, which is directed to an arrangement for storing image data related to a picture, includes "a plurality of levels arranged in a stacked relationship, each level having a different resolution and a different number of subpictures, wherein a subpicture in a higher level of the plurality of levels is capable of storing a larger predetermined maximum amount of data than a subpicture in a lower level of the plurality of levels." Castelli also teaches levels that store view

elements as a representation of an image. In Castelli, the view elements are compressed, either by spatial or frequency decomposition. However, there is at least one significant difference in the levels of Claim 38 and the levels taught by Castelli. In Castelli, each level contains all of the image data, whether it is compressed into spatial or frequency segments. This is illustrated in Fig. 6 of Castelli.

In contrast to Castelli, Claim 38 describes an arrangement of levels where the elements "defining a set of data belonging to the picture" are placed into different subpictures "defining a portion of the picture." The subpictures are arranged within different levels, "each level having a different resolution." Unlike Castelli, in claim 38, the entire image is not contained within one level, but instead is in a plurality of levels.

As such, Applicants respectfully submit that Claim 38 and those claims dependent therefrom distinguish over Castelli. Withdrawal of the rejection of Claim 38 and those claims dependent therefrom is respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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Respectfully submitted,

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